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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 5

9311 GROH ROAD
GROSSE ILE, MI 48138**29 APR 2013****MEMORANDUM**

Subject: ACTION MEMORANDUM - Request for Approval and Funding for a Time-Critical Removal Action at the Plastech Engineered Products Site, Andover, Ashtabula County, Ohio (Site ID #C5L1)

From: Elizabeth Nightingale, On-Scene Coordinator
Emergency Response Branch 1, Emergency Response Section 2

Through: Jason H. El-Zein, Chief
Emergency Response Branch 1

To: Richard C. Karl, Director
Superfund Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document your approval to expend up to \$328,327 to conduct a time-critical removal action at the Plastech Engineered Products Site ("site"), located in Andover, Ashtabula County, Ohio. The site, formerly an automotive body part manufacturing plant, is abandoned, unsecured, and contains a number of abandoned wastes, which have been determined to be hazardous. The time-critical removal action proposed herein is necessary to mitigate threats to public health, welfare, and the environment posed by the presence of uncontrolled hazardous substances at the site. There are no nationally significant or precedent-setting issues associated with the proposed response at this non-National Priority List site.

This Action Memorandum, if approved, would serve as approval for expenditures by the U. S. Environmental Protection Agency (EPA), as the lead technical agency, to take actions described herein to abate the imminent and substantial endangerment posed by the hazardous substances at the site. The proposed removal of the hazardous substances would be taken pursuant to Section 104(a)(1) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(a)(1), and Section 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. § 300.415.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID: OHN000510895

RCRA ID: OHD068896778

State ID: N/A

Category: Time-Critical

Site Location: 205 Maple Street Extension, Andover, Ashtabula County, Ohio, 44003

The site was operated by automotive body part manufacturing companies that used plastic injection molding and painting processes. Preliminary investigation by EPA indicates that Andover Industries BMPI (Andover Industries) operated at the site from approximately 1956 until it filed for bankruptcy in October 2004. In 2005, Plastech Engineered Products ("Plastech") purchased the site in a bankruptcy court auction and resumed manufacturing processes. In February 2008, manufacturing operations at the site ceased after Plastech filed for Chapter 11 bankruptcy. The bankruptcy judge entered an order of abandonment for the site by Plastech in February 2009. The site is currently an abandoned industrial property in a mixed residential/rural area in Andover, Ohio (Figure A-1). The property is approximately 20 acres in size and contains an approximately 274,000 square feet of building, outbuildings, as well as parking and undeveloped areas (Figure A-2).

According to the Ohio Environmental Protection Agency (Ohio EPA), Plastech was a large-quantity generator of hazardous wastes, which included spent solvent, waste paint, spent spray booth filters, spray booth coating waste, and used oil. Plastech characterized these as D001 (ignitable), D005 (barium), D035 (methyl ethyl ketone), and F003 and F005 (spent non-halogenated solvents).

Ohio EPA conducted periodic inspections of the site, including inspections in 2009, 2010 and 2012. During the recent inspections, Ohio EPA documented suspected hazardous substances that appeared to have been abandoned on site, including containers with corrosive and oxidizer labels, leaking transformers, trenches and sumps that appeared to contain paint and solvent waste, and other hazards. Access to the site was unrestricted and evidence of vandalism was present at the facility. On August 7, 2012, Ohio EPA referred the site to the EPA for consideration of a time critical removal action.

A. Site Description

1. Removal Site Evaluation

EPA conducted an assessment of the site on August 29, 2012. Assessment activities included site reconnaissance, air monitoring, radiation screening, container inventory, and collection of samples from select containers, an in-floor sump, a transformer and soil. The walkthrough and container inventory activities were conducted throughout all rooms within the former manufacturing building, outbuildings, and outdoor areas of the property.

For consistency, EPA used the same numeric designations for the eight site areas (Areas 1 through 8) used by Ohio EPA during previous inspections. Figure A-3 shows the inventory areas, which are briefly described below:

- Area 1** – former paint mixing area (3,860 square feet in area) in the northwest corner of the former manufacturing building with in-floor sumps and trenches;
- Area 2** – small (1,670 square feet) open courtyard between structural additions of the former manufacturing building; includes a small storage outbuilding and a caged electrical transformer on a concrete pad;
- Area 3** – large (40,000 square feet) raw material warehouse and storage area at the northeast corner of the former manufacturing building;
- Area 4** – small (780 square feet) outbuilding near the southern property line filled with parts and small containers;
- Area 5** – outdoor transformer cage and concrete pad (1,450 square feet) at the southeastern corner of the former manufacturing building;
- Area 6** – large (19,000 square feet) centrally-located room that formerly housed hydraulic plastics molding equipment; includes in-floor sumps and trenches for hydraulic oil;
- Area 7** – small (1,350 square feet) storage room in the north side of the former manufacturing building containing drums; and
- Area 8** – former paint line loading area and finishing room (14,800 square feet) in the western side of the former manufacturing building.

EPA inspectors documented a total of 23 drums containing an estimated total of 437 gallons of abandoned wastes at the site. All drums were located inside the manufacturing and outbuildings. Samples were collected from three drums. Two of the drums contained liquid, and one contained a solid material. All three drums were analyzed for flashpoint, corrosivity (pH), toxicity characteristic leaching procedure (TCLP) metals, TCLP volatile organic carbons (VOCs), and TCLP semi-volatile organic carbons (SVOCs). The waste in the first drum had a pH of 14 SUs, which exhibits the characteristic of corrosivity within the definition of 40 C.F.R. § 261.22(a)(1). TCLP lead was detected at 8.9 milligrams per liter (mg/L) in the second drum, which exceeds the toxicity characteristic limit for lead of 5.0 mg/L. All other results for samples taken from the drums were below the respective reporting limits or applicable regulatory limits.

In addition to the 23 drums, 40 small containers were documented at the site. A liquid sample was collected from one small container, and analyzed for the same parameters as the drum samples. All results for this sample were below the respective reporting limits or applicable regulatory limits. A solid sample was collected from another small container that was labeled as an oxidizer. This sample was identified using a Smiths Detection HazMatID 360 and an Ahura FirstDefender as 1,3 dichloro-5,5 dimethylhydantoin, with a trade name of Daktin. The material is a water-reactive, combustible solid that easily oxidizes, is reactive with xylene, and can produce toxic fumes in reaction to water. According to 40 C.F.R. § 261.22(a), waste is

characteristically reactive when it has violent reactions with water or generates dangerous toxic fumes when mixed with water.

Area 1 contains three in-floor sumps and trenches containing suspected paint sludge. During the site assessment, strong organic vapor odors and field screening readings near 400 ppm total VOCs were recorded. Directional flow was not observed in the sumps and trenches, and it is unknown whether these drains are a closed network. Spent spray booth filters were also observed inside a partially-dismantled former abatement system outside the northern side of the building. A liquid sample was collected from a sump in Area 1, and analyzed for flashpoint, corrosivity (pH), TCLP metals, TCLP VOCs, TCLP SVOCs, and polychlorinated biphenyls (PCBs). All results for this sample were below the respective reporting limits or applicable regulatory limits. Sumps and trenches in Area 6 were not sampled.

Four large electrical transformers in Areas 2 and 5 containing an estimated maximum total of 1,200 gallons of oil were observed at the site. In Area 5, surface soil, vegetation and the concrete pad around the transformers were coated with liquid oil. Samples of the oil within a transformer in Area 5 and the soil below it were collected and analyzed for PCBs. Aroclor 1260 was detected at 3.9 mg/kg in the liquid oil sample. This level is below the Toxic Substances Control Act regulatory limit of 50 ppm for electrical transformers. Aroclor 1260 was detected in the soil sample at a concentration of 0.43 mg/kg. This result is below the State of Ohio Generic Direct Contact regulatory limit of 18 mg/kg for soil on industrial and commercial properties. Transformers in Area 2 were not sampled.

Intact and broken fluorescent light ballasts were observed within the buildings. Fluorescent light ballasts often contain mercury at concentrations exceeding the TCLP limit of 0.2 mg/L and are considered to be universal waste, a category of hazardous waste, per 40 C.F.R. § 273.

Except as noted above, air monitoring readings inside the building remained at background levels throughout the site walkthrough. Micro-R radiation detector readings inside the buildings were consistently two to four times higher than background levels in the southern parking lot, which ranged from 4 to 6 micro-Roentgens. The slightly-elevated readings inside the former manufacturing building were consistent throughout the building and not specifically elevated near particular containers or rooms. Some manufacturers of automotive plastics or sheet molding compounds use equipment with a neutron-emitting source (such as americium-241 with beryllium) to monitor thicknesses of plastic products for quality control. However, no radiological sources were positively identified during the walkthrough. If a small neutron-emitting radiological source was abandoned inside the building, it is unlikely that readings collected with the Micro-R would be consistent throughout the building.

Sample sources, media and results are summarized in the attached Tables 1-3. The waste and hazardous substances at the site were not organized, secured, or maintained in a manner necessary to prevent exposure and/or release.

2. Physical location

The site is located at 205 Maple Street Extension, Andover, Ashtabula County, Ohio, 44003. The location coordinates are latitude 41.61278° and longitude - 80.56873°. The site is bounded by a wooded area to the north and east, a creek and residential properties to the south, and industrial and residential properties to the west.

An Environmental Justice (EJ) analysis for the site was conducted. Screening of the surrounding area used Region 5's EJ Screen Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT)). Region 5 has reviewed environmental and demographic data for the area surrounding the site at 205 Maple Street Extension, Andover, Ashtabula County, Ohio, 44003, and determined there is a low potential for EJ concerns at this location.

3. Site Characteristics

The site is an abandoned industrial property in a mixed residential/rural area in Andover, Ohio, and has a documented history of vandalism. The property is approximately 20 acres in size and contains a former manufacturing building of approximately 274,000 square feet and a southern parking lot. The site is bounded by a wooded area to the north and east, a creek and residential properties to the south, industrial and residential properties to the west. According to records from Ohio EPA, approximately 51 people reside within 0.5 miles of the site and 228 people reside within 1 mile of the site. An elementary school and a public library are located within 0.5 miles of the site. Pymatuning Valley Middle and High Schools are located 0.65 mile west of the site. The site is fenced, however not all gates are locked, allowing access by the public, potentially including neighborhood school children and trespassers. During the site assessment, EPA observed that several doorways and glass windows to the building had been damaged by vandalism. Other signs of vandalism were observed around the building, including graffiti, electrical transformer oil leaks onto the ground surface, and damage to electrical wiring in the building from unauthorized metal scrapping activities.

An unnamed creek along the southern site boundary flows east toward Pymatuning Reservoir located 1.7 miles downstream of the site. Pymatuning Reservoir is a man-made lake approximately 26.7 square miles in size along the border between Ohio and Pennsylvania. Pymatuning Reservoir is part of the Shenango River watershed and is surrounded by Pymatuning State Parks in Ohio and Pennsylvania. Pymatuning Reservoir also serves as a local public water supply for residents in Ohio and Pennsylvania.

According to Ohio EPA, the site is located within a Source Water Protection Area for the Village of Andover. According Ohio EPA, the public groundwater supply in Andover, Ohio, is highly susceptible to contamination because the source aquifer has a shallow depth to water of 12 to 25 feet below ground surface; the aquifer is not well-confined from surface infiltration; and potential contaminant sources are located in the Source Water Protection Area. The Village public water system supplies approximately 1,150 residents. The public water system draws from seven groundwater wells pumping approximately 186,000 gallons per day.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

As described above, hazardous substances were documented at the site during the assessment. Characteristically corrosive, toxic and reactive wastes were documented, as well as high atmospheric levels of VOCs in former painting areas. Seven total samples were collected from among the 23 drums, 40 small containers, four transformers, and sumps and trenches that were observed on site. The content of majority of the remaining containers is unknown, as most were unlabeled. The known and suspected hazardous substances located on site have the potential to be released through container degradation or vandalism, and migrate off-site and into ground and surface waters. These chemicals could be ingested by children and pets; tracked off-site by visitors and trespassers; and spread throughout the area, into residential homes, and businesses. Release of these chemicals could impact the shallow groundwater aquifer used by the community as a source of drinking water. There is a potential for direct contact with the hazardous substances because the site is bordered by a residential neighborhood and within half a mile of an elementary school and public library. Access to the site is not restricted.

5. NPL status

The site is not on the National Priorities List (NPL), and has not been proposed for listing.

6. Maps, pictures and other graphic representations

A figure detailing the location of the site is included in the attached Site Location Map (Figure A-1). A figure detailing site features and site boundaries is presented in the attached Site Features Map (Figure A-2). A figure detailing site inventory work locations is presented in the attached Site Inventory Map (Figure A-3). Table A-1 summarizes the samples collected. Table A-2 summarizes the drum sample analytical results. Table A-3 summarizes the other sampling (non-drum) analytical results.

B. Other Actions to Date

1. Previous actions

There have been no previous EPA response actions at this site. The referral submitted by Ohio EPA indicated that in February 2009, Trusted Partners, LLC, a company that purchased Plastech's assets during the bankruptcy, removed a limited amount of substances (approximately 800 pounds) from the site.

2. Current actions

No actions are currently being taken at the site. The proposed action will not impede future actions based on available information.

C. State and Local Authorities' Roles

1. State and local actions to date

As detailed above, Ohio EPA has conducted a number of inspections at this site. On June 15, 2009, Ohio EPA issued a Notice of Violation (NOV) letter to Plastech Engineered Products and to James Carroll, Chief Liquidating Officer for the bankruptcy trustee, for violations of Ohio's Cessation of Regulated Operations laws. Ohio EPA did not receive a response to the NOV. On August 7, 2012, Bruce McCoy, Compliance Section, Division of Materials and Waste Management, Ohio EPA, sent a letter to EPA requesting an evaluation of the site for a time critical removal action.

2. Potential for continued state/local response

State and local government assistance will be required during the removal action for those governmental functions that are inherently state and local. Given the exigency of the situation, neither the state nor local governments have the resources to conduct a removal action.

III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

EPA's recent assessment indicates that conditions at the site present an imminent and substantial threat to the public health, or welfare, and the environment and meet the criteria for a time-critical removal action as provided for in the NCP, 40 C.F.R. § 300.415(b)(2). These criteria include, but are not limited to, the following:

1. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.

Uncontrolled hazardous substances including reactive oxidizers, toxic substances and highly caustic substances were documented during the site assessment. Many waste containers are in poor condition and there are signs of leakage or spillage on nearby floor surfaces inside the building. Oil-stained surface soil and vegetation was observed surrounding three electrical transformers outside the building. During the site assessment, signs of unauthorized access to the site property and building were observed.

Uncontrolled hazardous substances at the site could be released to soil and groundwater, the atmosphere, and nearby surface waterways. Potential exposure through each of these migration pathways could cause imminent endangerment to human health, welfare, or the environment. Overall, the potential for exposure to hazardous substances stored at the site is high, especially considering that the on-site building is no longer occupied and vandals have accessed the interior of the facility.

2. Actual or potential contamination of drinking water supplies or sensitive ecosystems.

Hazardous wastes or potentially hazardous materials inside the site buildings can become compromised and secondary containment is not present. Intentional or accidental releases of hazardous waste from the site could enter the on-site unnamed tributary to the Pymatuning Reservoir (a public water supply), which is less than 100 feet from the rear of the building; and the shallow groundwater aquifer that serves as the public water supply for the Village of Andover. A release to these waterbodies would contaminate other nearby surface water bodies, and potentially affect drinking water supplies and sensitive ecosystems.

3. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release

Drums, small containers, sumps and trenches contain hazardous waste or potentially hazardous chemicals, including corrosive liquids, toxic substances, and volatile liquids reactive solids are present at the site. Many of the containers are in poor condition, open, and/or corroded. As described above, several samples from site containers were identified as characteristically hazardous wastes. Access to the buildings, which are not monitored or secured, increases the likelihood of trespassing and vandalism, evidence of which is at the site already. Weathering and activity of trespassers could cause containers to breach, releasing the contents of the containers into the environment.

4. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.

According to the Natural Resources Conservation Service National Water and Climate Center, the Ashtabula County area experiences an average of 39 inches of precipitation per year.

Several doorways and glass windows to the former manufacturing building are damaged. Many containers are in poor or damaged condition and are exposed to a wide range of ambient temperatures throughout the year because the building is unheated.

Weather conditions such as heavy rainfall, high winds, snow melt, and flooding could infiltrate the building and further degrade waste containers or increase the likelihood of off-site migration of hazardous substances into the on-site unnamed creek, which flows into the Pymatuning Reservoir, or to the shallow groundwater aquifer below the site.

5. Threat of fire or explosion.

The threat of fire or explosion at the site is low. However, if the building at the site were to catch fire, suppression water would certainly wash hazardous substances and hazardous substance containing soil off-site. Contaminated fire-suppression runoff could impact the nearby waterbodies.

6. The availability of other appropriate federal or state response mechanisms to respond to the release.

On August 7, 2012, Ohio EPA sent a letter to the EPA recommending that the site be referred to the Removal Program for a removal action, as the State does not have the resources to undertake the removal action. No other federal or state response mechanism is available to respond in a timely manner given the exigencies of the situation.

IV. ENDANGERMENT DETERMINATION

Given the site conditions, the nature of the known and suspected hazardous substances on site, and the potential exposure pathways described in Sections II and III, actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The response actions described in this memorandum directly address actual or potential releases of hazardous substances at the site, which may pose an imminent and substantial endangerment to public health, or welfare, or the environment. Removal activities on-site will include:

- a) Developing and implementing a site-specific Health and Safety Plan, including an Air Monitoring Plan, and a site Emergency Contingency Plan;
- b) Developing and implementing a Site Work Plan that includes a Site Security Plan;
- c) Securing, characterizing, and sampling suspected hazardous substances, contained or uncontained, in compliance with a site-specific quality assurance/quality control (QA/QC) Plan;
- d) Addressing other contaminated media in accordance with Applicable, Appropriate, and Relevant Requirements to the extent practicable;
- e) Consolidating and packaging hazardous substances, pollutants and contaminants for transportation and off-site disposal;
- f) Decontaminating contaminated structures as necessary;

- g) Transporting and disposing of all characterized or identified hazardous substances, pollutants, wastes, or contaminants that pose a substantial threat of release at a Resource Conservation and Recovery Act/CERCLA-approved disposal facility in accordance with EPA's Off-site Rule (40 C.F.R. § 300.440), as applicable; and

The response action proposed herein will mitigate the threats at the site by properly identifying, consolidating, and packaging hazardous materials on-site. The consolidated materials will be removed and ultimately disposed of off-site. Additional site activities may include security, perimeter air monitoring, and decontamination on the site, as needed to complete the removal action. This response action will be conducted in accordance with Section 104(a)(1) of CERCLA, 42 U.S.C. § 9604(a)(1) and Section 300.415 of the NCP, 40 C.F.R. § 300.415, to abate or eliminate the immediate threat posed to public health and/or the environment by the presence of the hazardous substances. No uncontrolled hazardous substances are expected to remain at the site once the removal action is completed.

The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal site control consistent with the provisions of Section 300.415(l) of the NCP. Removal of hazardous material is expected to minimize the need for post-removal site control.

All hazardous substances, pollutants or contaminants removed off-site pursuant to this removal action for treatment, storage and disposal shall be treated, stored, or disposed at a facility in compliance, as determined by the EPA, in compliance with the EPA Off-Site Rule, 40 C.F.R. § 300.440.

2. Contribution to remedial performance

The proposed action will not impede future actions based on available information. No further action is anticipated once the proposed removal action is completed.

3. Engineering Evaluation/Cost Analysis (EE/CA)

Not Applicable.

4. Applicable or relevant and appropriate requirements (ARARs)

All identified applicable or relevant and appropriate requirements (ARARs) of Federal and State law will be complied with to the extent practicable considering the exigencies of the situation. The OSC sent a letter dated March 1, 2013, requesting ARARs to Mr. Frank Zingales, Ohio EPA, Division of Materials and Waste Management.

Federal

While it is not strictly an ARAR, all hazardous substances removed off-site pursuant to this removal action for treatment, storage, and disposal will be treated, stored, or disposed of at a facility in compliance, as EPA determines, with the Off-Site Rule, 40 C.F.R. § 300.440.

State

On March 4, 2013, Ohio EPA responded to the EPA ARAR request with a list of State hazardous waste regulations, and noted several specific sections that may be applicable. These include Section 3734.02 of the Ohio Revised Code, and portions of Section 3745 of the Ohio Administrative Code. The OSC will evaluate these ARARs, and if applicable, comply with these and other known State ARARs to the extent practicable.

5. Project schedule

The proposed activities listed in Section V of this memorandum will require an estimated 26 on-site working days to complete. A warrant may be sought for access to the site, if a voluntary access agreement cannot be obtained.

6. Estimated costs

REMOVAL ACTION PROJECT CEILING ESTIMATE	
<u>Extramural Costs:</u>	
<u>Regional Removal Allowance Costs:</u>	
Total Cleanup Contractor Allowance Costs (This cost category includes estimates for ERRS, subcontractors, Notices to Proceed, and Interagency Agreements with Other Federal Agencies. Includes a 20% contingency)	\$ 232,708
<u>Other Extramural Costs Not Funded from the Regional Allowance:</u>	
Total START, including multiplier costs	\$ 40,898
Subtotal Extramural Costs	\$ 273,606
Extramural Costs Contingency (20% of Subtotal)	\$ 54,721
TOTAL REMOVAL ACTION PROJECT CEILING	\$ 328,327

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Given the site conditions, the nature of the hazardous substances on-site, the potential exposure pathways to nearby populations described in Sections II, III, and IV above, and the actual or threatened release of hazardous substances from the site, failing to take or delaying action may present an imminent and substantial endangerment to public health, welfare or the environment.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in the Enforcement Confidential Addendum.

$$(\$328,327 + \$74,198) + (61.61\% \times \$402,525) = \$650,521$$

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$650,521.00¹.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Plastech Engineered Products Site in Andover, Ashtabula County, Ohio. This document has been developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the site, see Attachment II. Conditions at the site meet the NCP § 300.415(b)(2) criteria for a time-critical removal action and I recommend your approval.

¹ Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost account methodology effective October, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

The total removal project ceiling, if approved, will be \$328,327. Of this, an estimated \$287,429 may be used for the cleanup contractor costs. You may indicate your decision by signing below.

APPROVE: 
Director, Superfund Division

DATE: 4-29-13

DISAPPROVE: _____
Director, Superfund Division

DATE: _____

Enforcement Addendum

Figures:

- A-1: Site Location Map
- A-2: Site Features Map
- A-3: Site Inventory Map

Tables:

- A-1: Sample Summary
- A-2: Drum Sampling Analytical Results
- A-3: Small Container, Sump, Transformer and Soil Sampling Analytical Results

Attachments:

- I. Detailed Cleanup Contractor Cost Estimate
- II. Administrative Record Index
- III. Independent Government Cost Estimate

cc: Sherry Fielding, U.S. EPA, 5104A
fielding.sherry@epa.gov
Valincia Darby, U.S. Department of the Interior, w/o Enf. Addendum
Valincia_darby@ios.doi.gov
Scott Nally, Director, OEPA, w/o Enf. Addendum
(email: scott.nally@epa.state.oh.us)
Mike DeWine, Ohio Attorney General, w/o Enf. Addendum
(email: Mike.DeWine@ohioattorneygeneral.gov)
Frank Zingales, OEPA, w/o Enf. Addendum
(email: frank.zingales@epa.state.oh.us)

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NOT RELEVANT TO SELECTION OF

REMOVAL ACTION

FIGURE A-1

U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION
SITE LOCATION MAP FOR PLASTECH ENGINEERED PRODUCTS SITE
ANDOVER, ASHTABULA COUNTY, OHIO

ORIGINAL
APRIL 2013

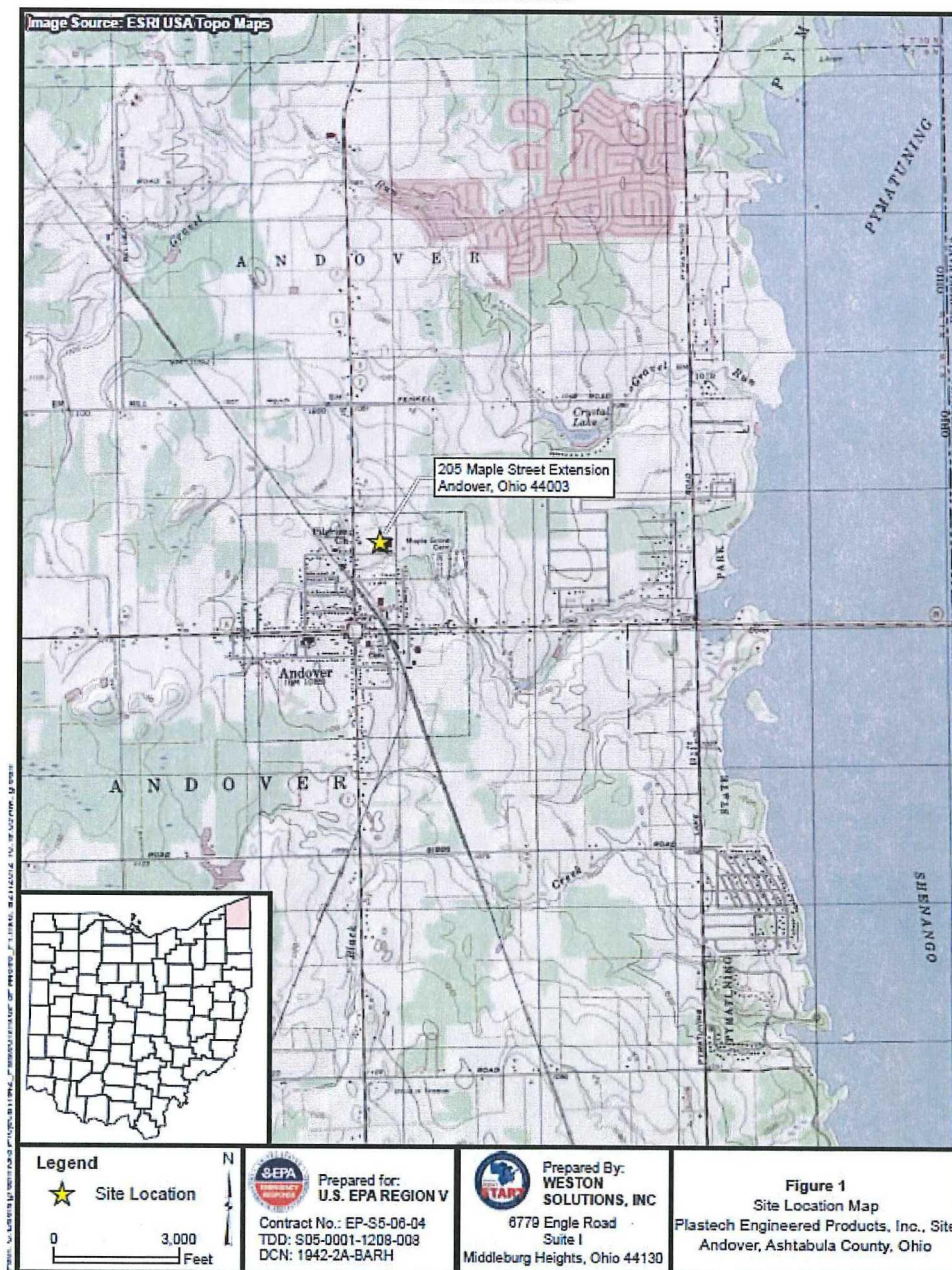


FIGURE A-2

**U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION
SITE FEATURES MAP FOR PLASTECH ENGINEERED PRODUCTS SITE
ANDOVER, ASHTABULA COUNTY, OHIO**

**ORIGINAL
APRIL 2013**

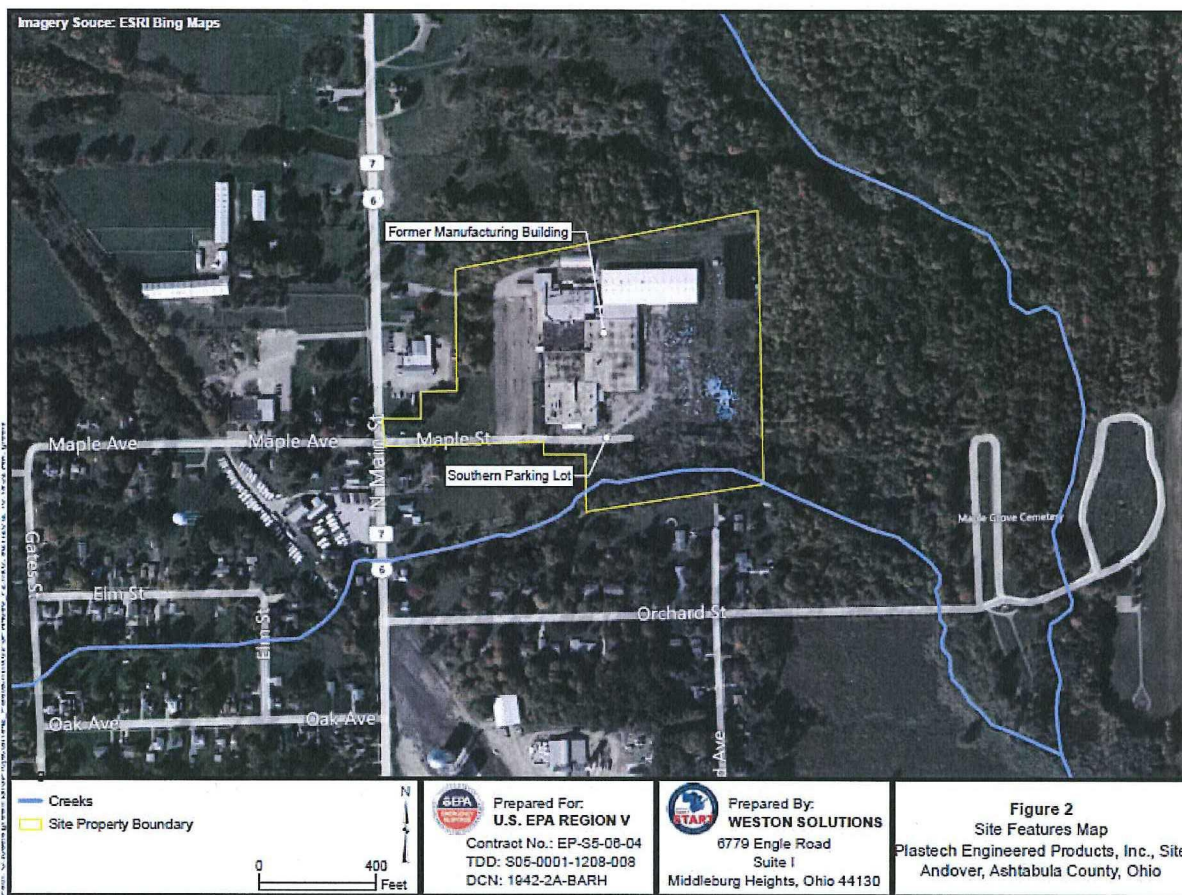


FIGURE A-3

U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION
SITE FEATURES MAP FOR PLASTECH ENGINEERED PRODUCTS SITE
ANDOVER, ASHTABULA COUNTY, OHIO

ORIGINAL
APRIL 2013

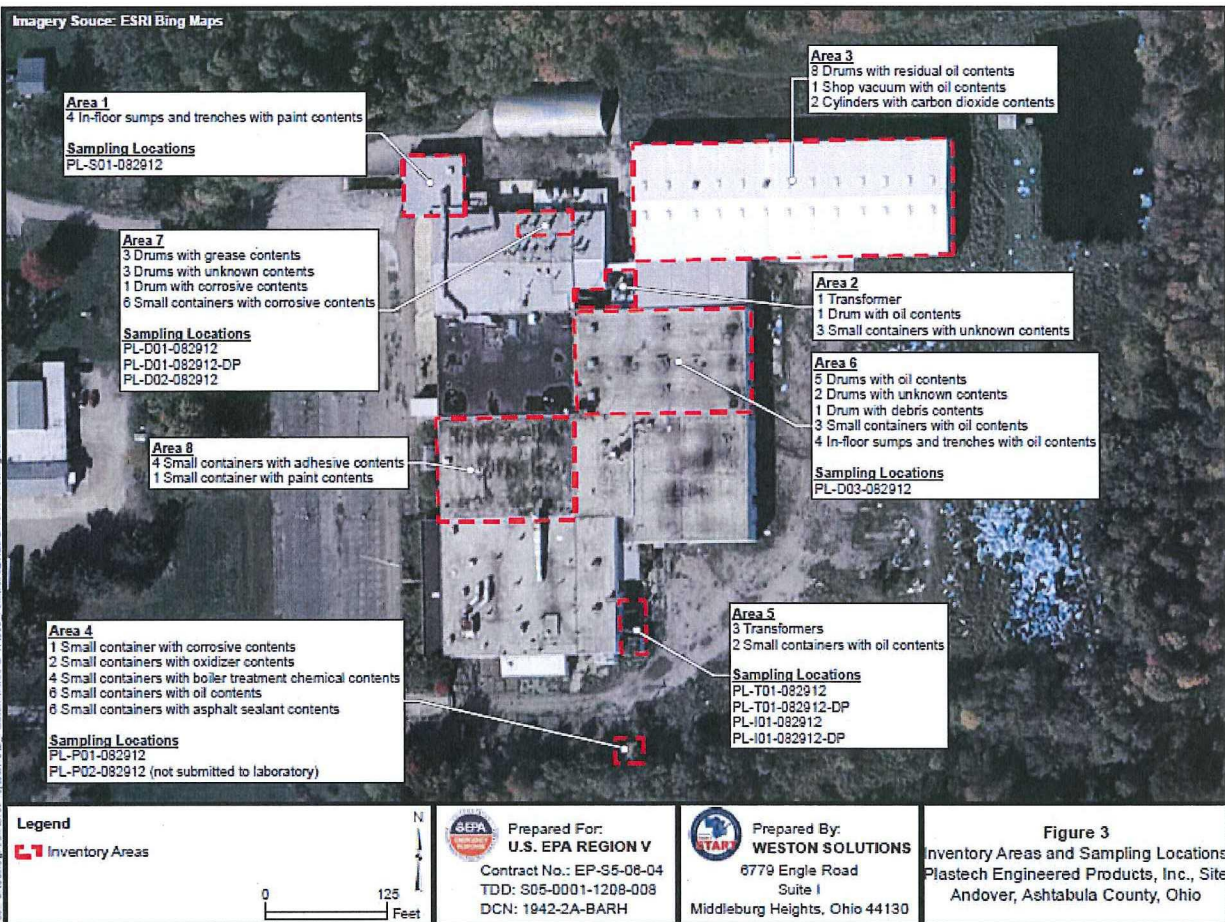


TABLE A-1**U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION****SAMPLING SUMMARY FOR PLASTECH ENGINEERED PRODUCTS SITE
ANDOVER, ASHTABULA COUNTY, OHIO****ORIGINAL
APRIL 2013**

Sample No.	Matrix	Container and Contents	Field Screening Results	Requested Analyses
PL-D01-082912	Liquid	Drum D01 in Area 7, "Corrosive" label, blue liquid	VOCs = 51.2 ppm pH = 14 SUs	Flashpoint, pH, TCLP metals, TCLP VOCs, TCLP SVOCs
PL-D01-082912-DP	Liquid	Duplicate of PL-D01-082912	VOCs = 51.2 ppm pH = 14 SUs	Flashpoint, pH, TCLP metals, TCLP VOCs, TCLP SVOCs
PL-D02-082912	Solid	Drum D02 in Area 7, white grease	None	Flashpoint, pH, TCLP metals, TCLP VOCs, TCLP SVOCs
PL-D03-082912	Liquid	Drum D03 in Area 6, oil waste	None	Flashpoint, pH, TCLP metals, TCLP VOCs, TCLP SVOCs, PCBs
PL-P01-082912	Liquid	Small container P01 in Area 4, "Corrosive" label, yellow liquid	VOCs = 18.3 ppm pH = 11 SUs	Flashpoint, pH, TCLP metals, TCLP VOCs, TCLP SVOCs
PL-S01-082912	Liquid	Sump S01 in Area 1, viscous synthetic compound, strong solvent odor	VOCs = 398 ppm	Flashpoint, pH, TCLP metals, TCLP VOCs, TCLP SVOCs, PCBs
PL-T01-082912	Liquid	Transformer T01 in Area 5	None	PCBs
PL-T01-082912-DP	Liquid	Duplicate of PL-D01-082912	None	PCBs
PL-I01-082912	Soil	Surface soil in Area 5	None	PCBs
PL-I01-082912-DP	Soil	Duplicate of PL-I01-082912	None	PCBs

Notes:

PCB = Polychlorinated biphenyl

ppm = Part per million

TCLP = Toxicity Characteristic Leaching Procedure

SU = Standard unit

SVOC = Semivolatile organic compound

VOC = Volatile organic compound

TABLE A-2

U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION

DRUM SAMPLING ANALYTICAL RESULTS FOR PLASTECH ENGINEERED PRODUCTS SITE
ANDOVER, ASHTABULA COUNTY, OHIO

ORIGINAL APRIL 2013

Parameter	Analytical Method	Unit	Regulatory Limit	Sample No.			
				PL-D01-082912	PL-D01-082912-DP	PL-D02-082912	PL-D03-082912
Characteristic							
Flashpoint	SW846-1010	°F	< 140	> 180	> 180	> 180	> 180
Corrosivity	SW846-9041A	pH SUs	< 2 or > 12.5	14 HF	14 HF	8.0 HF	6.0 HF
ICLP Metals							
Arsenic	SW846-6010C	mg/L	5	2.0 U	0.014 J	0.50 U	0.50 U
Barium	SW846-6010C	mg/L	100	0.032 JB	0.029 JB	0.0066 JB	4.6 JB
Cadmium	SW846-6010C	mg/L	1	0.40 U	0.40 U	0.10 U	0.66
Chromium	SW846-6010C	mg/L	5	0.019 J	0.029 J	0.0036 J	0.5
Lead	SW846-6010C	mg/L	5	0.13 J	0.18 J	0.0067 J	8.9
Mercury	SW846-7470A	mg/L	0.2	0.20 U	0.20 U	0.0020 U	0.033 U
Selenium	SW846-6010C	mg/L	1	0.087 JB	0.13 JB	0.0047 JB	0.50 U
Silver	SW846-6010C	mg/L	5	2.0 U	2.0 U	0.50 U	0.50 U
ICLP VOCs							
Benzene	SW846-8260B	mg/L	0.5	0.50 U	0.50 U	0.025 U	0.50 U
Carbon tetrachloride	SW846-8260B	mg/L	0.5	0.50 U	0.50 U	0.025 U	0.50 U
Chlorobenzene	SW846-8260B	mg/L	100	0.50 U	0.50 U	0.025 U	0.50 U
Chloroform	SW846-8260B	mg/L	6	0.50 U	0.50 U	0.025 U	0.50 U
1,2-Dichloroethane	SW846-8260B	mg/L	0.5	0.50 U	0.50 U	0.025 U	0.50 U
1,1-Dichloroethene	SW846-8260B	mg/L	0.7	0.50 U	0.50 U	0.025 U	0.50 U
Methyl ethyl ketone (2-butanone)	SW846-8260B	mg/L	200	2.7 J	3.8 J	0.25 U	0.32 J
Tetrachloroethylene	SW846-8260B	mg/L	0.7	0.50 U	0.50 U	0.025 U	0.50 U
Trichloroethylene	SW846-8260B	mg/L	0.5	0.50 U	0.50 U	0.025 U	0.50 U
Vinyl chloride	SW846-8260B	mg/L	0.2	0.50 U	0.50 U	0.025 U	0.50 U
ICLP SVOCs							
1,4-Dichlorobenzene	SW846-8270C	mg/L	7.5	14 U	15 U	0.080 U	100 U
2,4-Dinitrotoluene	SW846-8270C	mg/L	0.13	69 U	74 U	0.40 U	500 U
Hexachlorobenzene	SW846-8270C	mg/L	0.13	69 U	74 U	0.40 U	500 U
Hexachlorobutadiene	SW846-8270C	mg/L	0.5	69 U	74 U	0.40 U	500 U
Hexachloroethane	SW846-8270C	mg/L	3	69 U	74 U	0.40 U	500 U
2-Methylphenol	SW846-8270C	mg/L	200	14 U	15 U	0.080 U	100 U
3- and 4-Methylphenol	SW846-8270C	mg/L	200	140 U	150 U	0.80 U	1,000 U
Nitrobenzene	SW846-8270C	mg/L	2	14 U	15 U	0.080 U	100 U
Pentachlorophenol	SW846-8270C	mg/L	100	140 U	150 U	0.80 U	1,000 U
Pyridine	SW846-8270C	mg/L	5	69 U	74 U	0.40 U	500 U
2,4,5-Trichlorophenol	SW846-8270C	mg/L	400	69 U	74 U	0.40 U	500 U
2,4,6-Trichlorophenol	SW846-8270C	mg/L	2	69 U	74 U	0.40 U	500 U

Parameter	Analytical Method	Unit	Regulatory Limit	Sample No.			
				PL-D01-082912	PL-D01-082912-DP	PL-D02-082912	PL-D03-082912
PCBs							
Aroclor 1016	SW846-8082	mg/kg	50	-	-	-	9.300 U
Aroclor 1221	SW846-8082	mg/kg	50	-	-	-	9.300 U
Aroclor 1232	SW846-8082	mg/kg	50	-	-	-	9.300 U
Aroclor 1242	SW846-8082	mg/kg	50	-	-	-	9.300 U
Aroclor 1248	SW846-8082	mg/kg	50	-	-	-	9.300 U
Aroclor 1254	SW846-8082	mg/kg	50	-	-	-	9.300 U
Aroclor 1260	SW846-8082	mg/kg	50	-	-	-	9.300 U

Notes:

Bold results indicate detected compounds.

Highlighted results exceed regulatory limits.

- = Not tested

°F = Degree Fahrenheit

B = Compound detected in the blank and sample

HF = Field parameter with a holding time of 15 minutes

J = Estimated

mg/kg = Milligram per kilogram

mg/L = Milligram per liter

PCB = Polychlorinated biphenyl

SU = Standard unit

SVOC = Semivolatile organic compound

TCLP = Toxicity Characteristic Leaching Procedure

U = Not detected

VOC = Volatile organic compound

TABLE A-3

U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION

SMALL CONTAINER, SUMP, TRANSFORMER AND SOIL ANALYTICAL RESULTS FOR PLASTECH ENGINEERED PRODUCTS SITE
ANDOVER, ASHTABULA COUNTY, OHIOORIGINAL
APRIL 2013

Parameter	Analytical Method	Unit	Regulatory Limit	Sample No.					
				PL-P01-082912	PL-S01-082912	PL-T01-082912	PL-T01-082912-DP	PL-I01-082912	PL-I01-082912-DP
Characteristic									
Flashpoint	SW846-1010	°F	< 140	> 180	> 180	-	-	-	-
Corrosivity	SW846-9041A	pH SU's	< 2 or > 12.5	11 HF	6.0 HF	-	-	-	-
TCLP Metals									
Arsenic	SW846-6010C	mg/L	5	2.0 U	0.50 U	-	-	-	-
Barium	SW846-6010C	mg/L	100	0.031 JB	0.0058 JB	-	-	-	-
Cadmium	SW846-6010C	mg/L	1	0.40 U	0.10 U	-	-	-	-
Chromium	SW846-6010C	mg/L	5	0.027 J	0.0035 J	-	-	-	-
Lead	SW846-6010C	mg/L	5	0.026 J	0.0094 J	-	-	-	-
Mercury	SW846-7470A	mg/L	0.2	0.20 U	0.0020 U	-	-	-	-
Selenium	SW846-6010C	mg/L	1	0.16 JB	0.016 JB	-	-	-	-
Silver	SW846-6010C	mg/L	5	2.0 U	0.50 U	-	-	-	-
TCLP VOC's									
Benzene	SW846-8260B	mg/L	0.5	0.10 U	0.050 U	-	-	-	-
Carbon tetrachloride	SW846-8260B	mg/L	0.5	0.10 U	0.050 U	-	-	-	-
Chlorobenzene	SW846-8260B	mg/L	100	0.10 U	0.050 U	-	-	-	-
Chloroform	SW846-8260B	mg/L	6	0.10 U	0.050 U	-	-	-	-
1,2-Dichloroethane	SW846-8260B	mg/L	0.5	0.10 U	0.050 U	-	-	-	-
1,1-Dichloroethene	SW846-8260B	mg/L	0.7	0.10 U	0.050 U	-	-	-	-
Methyl ethyl ketone (2-butanone)	SW846-8260B	mg/L	200	1.0 U	3.7	-	-	-	-
Tetrachloroethylene	SW846-8260B	mg/L	0.7	0.10 U	0.050 U	-	-	-	-
Trichloroethylene	SW846-8260B	mg/L	0.5	0.10 U	0.050 U	-	-	-	-
Vinyl chloride	SW846-8260B	mg/L	0.2	0.10 U	0.050 U	-	-	-	-
TCLP SVOC's									
1,4-Dichlorobenzene	SW846-8270C	mg/L	7.5	0.80 U	0.20 U	-	-	-	-
2,4-Dinitrotoluene	SW846-8270C	mg/L	0.13	4.0 U	1.0 U	-	-	-	-
Hexachlorobenzene	SW846-8270C	mg/L	0.13	4.0 U	1.0 U	-	-	-	-
Hexachlorobutadiene	SW846-8270C	mg/L	0.5	4.0 U	1.0 U	-	-	-	-
Hexachloroethane	SW846-8270C	mg/L	3	4.0 U	1.0 U	-	-	-	-
2-Methylphenol	SW846-8270C	mg/L	200	0.80 U	0.20 U	-	-	-	-
3- and 4-Methylphenol	SW846-8270C	mg/L	200	8.0 U	2.0 U	-	-	-	-
Nitrobenzene	SW846-8270C	mg/L	2	0.80 U	0.20 U	-	-	-	-
Pentachlorophenol	SW846-8270C	mg/L	100	8.0 U	2.0 U	-	-	-	-
Pyridine	SW846-8270C	mg/L	5	4.0 U	1.0 U	-	-	-	-
2,4,5-Trichlorophenol	SW846-8270C	mg/L	400	4.0 U	1.0 U	-	-	-	-
2,4,6-Trichlorophenol	SW846-8270C	mg/L	2	4.0 U	1.0 U	-	-	-	-

Parameter	Analytical Method	Unit	Regulatory Limit	Sample No.					
				PL-P01-082912	PL-S01-082912	PL-T01-082912	PL-T01-082912-DP	PL-F01-082912-DP	
PCBs									
Aroclor 1016	SW846-8082	mg/kg	50	-	0.950 U	0.990 U	1.000 U	0.250 U	0.560 U
Aroclor 1201	SW846-8082	mg/kg	50	-	0.950 U	0.990 U	1.000 U	0.250 U	0.560 U
Aroclor 1232	SW846-8082	mg/kg	50	-	0.950 U	0.990 U	1.000 U	0.250 U	0.560 U
Aroclor 1242	SW846-8082	mg/kg	50	-	0.950 U	0.990 U	1.000 U	0.250 U	0.560 U
Aroclor 1248	SW846-8082	mg/kg	50	-	0.950 U	0.990 U	1.000 U	0.250 U	0.560 U
Aroclor 1254	SW846-8082	mg/kg	50	-	0.950 U	0.990 U	1.000 U	0.250 U	0.560 U
Aroclor 1260	SW846-8082	mg/kg	50	-	0.950 U	3.900	3.900	0.430	0.830

Notes:

Bold results indicate detected compound.

- = Not tested

F = Degree Fahrenheit

B = Compound detected in the blank and sample

HF = Field parameter with a holding time of 15 minutes

J = Estimated

mg/kg = Milligram per kilogram

mg/L = Milligram per liter

PCB = Polychlorinated biphenyl

SU = Standard unit

SVOC = Semivolatile organic compound

TCLP = Toxicity Characteristic Leaching Procedure

U = Not detected

VOC = Volatile organic compound

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

CONFIDENTIAL ENFORCEMENT ADDENDUM

FOR

PLASTECH ENGINEERED PRODUCTS SITE,

ANDOVER, ASHTABULA COUNTY, OHIO

ENFORCEMENT SENSITIVE - DO NOT RELEASE - NOT
SUBJECT TO DISCOVERY - FIOA EXEMPT

ORIGINAL

APRIL 2013

HAS BEEN REDACTED

FIVE PAGES

ENFORCEMENT SENSITIVE

NOT APPLICABLE TO DISCOVERY

NOT RELEVANT TO SELECTION OF REMOVAL ACTION

ATTACHMENT I
U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

DETAILED CLEANUP CONTRACTOR ESTIMATE
FOR
PLASTECH ENGINEERED PRODUCTS SITE
ANDOVER, ASHTABULA COUNTY, OHIO

ORIGINAL
APRIL 2013

HAS BEEN REDACTED

ONE PAGE

ENFORCEMENT SENSITIVE

NOT APPLICABLE TO DISCOVERY

NOT RELEVANT TO SELECTION OF REMOVAL ACTION

ATTACHMENT 2

U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION

ADMINISTRATIVE RECORD FOR PLASTECH ENGINEERED PRODUCTS SITE ANDOVER, ASHTABULA COUNTY, OHIO

ORIGINAL
APRIL 2013

NO.	SEMS ID	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
1	902217	00/00/00	Ohio EPA	File	Ohio EPA Time-Critical Removal Action Referral Package	5
2	902218	02/11/09	Zingales, F., Ohio EPA	File	Inspection Field Notes For Former Plastech-Andover Facility	6
3	902219	06/15/09	Zingales, F., Ohio EPA	Scott, K., Plastech	Letter Re: Plastech Engineered Products-Andover Facility	4
4	902220	04/26/10	Zingales, F., Ohio EPA	File	Inspection Field Notes For Former-Plastech-Andover Facility	9
5	902221	06/13/12	Zingales, F., Ohio EPA	File	Inspection Field Notes For Former-Plastech-Andover Facility	6
6	902222	06/25/12	Ohio EPA	File	Map Re: Former Plastech Andover Facility Attachment 1	10
7	902171	08/07/12	McCoy, B., Ohio EPA	Durno, M., U.S. EPA	Letter Re: Request For Federal Assistance	2
8	902172	02/11/13	Green, R., Weston Solutions	Nightingale, E., U.S. EPA	Letter Re: Site Assessment Report For The Plastech Engineered Products Site	65
9	902173	03/01/13	Nightingale, E., U.S. EPA	Zingales, F., Ohio EPA	Letter Re: U.S. EPA Request For Ohio EPA To Identify All ARARs For The Plastech Engineered Products Site	1
10	902174	03/04/13	Zingales, F., Ohio EPA	Nightingale, E., U.S. EPA	Letter Re: ARARs For The Plastech Site	2

ATTACHMENT III
U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

INDEPENDENT GOVERNMENT COST ESTIMATE
FOR
PLASTECH ENGINEERED PRODUCTS SITE
ANDOVER, ASHTABULA COUNTY, OHIO

ORIGINAL
APRIL 2013

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NOT RELEVANT TO SELECTION OF REMOVAL ACTION